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Amdt. dated February 28, 2005  
Reply to Final Office action of Dec. 30, 2004

Serial No. 09/579,864  
Docket No. STL920000034US1  
Firm No. 0054.0029

### REMARKS/ARGUMENTS

The Examiner rejected claims 1-21 as obvious (35 U.S.C. §103) over Stedman (U.S. Patent No. 6,081,837) and Imai (U.S. Patent No. 6,148,334).

Amended claims 1 and 15 concern providing information describing a file system connection between a local file system located on a local system and a host file system located on a host system, said method comprising: encoding the information in a metalanguage format comprising one or more tags, each tag having an identifier and a set of one or more attributes, wherein the encoded information comprises a file system connection descriptor; said file system connection descriptor comprising: a local system data structure comprising at least one tag representing the local file system; a host system data structure comprising at least one tag representing the host file system; and a mapping data structure comprising at least one tag representing a mapping between the local file system and the host file system; and parsing the file system connection descriptor according to the metalanguage tags.

Applicants amended these claims to recite that the local system, host system, and mapping data structures each comprise at least one tag. These additional requirements are disclosed at least at pages 17-23 and FIGs. 12-17.

Applicants discussed during the phone interview an amendment to the independent claims to tie the file system connection descriptor parts to the tags of the metalanguage format. Applicants submit that this amendment satisfies this discussed amendment by specifying how the local system, host system, and mapping data structures comprise tags of the metalanguage format.

The Examiner cited col. 19, lines 53-67 and col. 20, lines 1-25 of Stedman as teaching the claim requirement of encoding the information in a metalanguage format comprising one or more tags, each tag having an identifier and a set of one or more attributes. (Final Office Action, pg. 2) Applicants traverse.

The cited col. 19 mentions that a host extension creates an HTML document and inserts URLs within the document and tags that identify where the session ID is placed. Stedman defines the host extension as receiving information from a host computer and creating a set of instructions that is transferred via the server application framework to the client computer. The client computer utilizes these instructions to create Web pages. (Stedman, col. 2, lines 47-55)

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The cited col. 19 further mentions that the server application framework replaces session ID tags with the appropriate session ID.

The cited col. 19 discusses how a host extension creates an HTML document with tags for the session ID to send to the client system. Nowhere does this cited col. 19 of Stedman anywhere teach or suggest that the host extension encode information on a file system connection descriptor comprising a local data system, a host system data structure, and a mapping data structure each comprising at least one tag. Moreover, nowhere does the cited col. 19 teach or suggest tags that represent the local file system, the host file system; and a mapping between the local file system and the host file system. Instead, the cited host extension encodes information for a session ID between a web server and client.

The cited col. 20 mentions that the host extension inserts a tag that is a placeholder for an identifier and the server replaces this tag with a unique identifier. The server application framework further passes the HTML document to the web server, which sends the document to the originating web browser on the client. The web server keeps track of multiple web browser applications to return HTML documents. There may be multiple host extension processes on the server to handle the connection with different client web browsers having a valid session ID. (Stedman, col. 20, lines 1-25).

Although the cited col. 20 of Stedman discusses how host extension processes create tags in HTML documents for a connection with client web browsers, nowhere does the cited col. 20 anywhere teach or suggest that the host extension encode information in a metalanguage format on a file system connection descriptor comprised of tags representing a local file system, a host file system, and a mapping as claimed. Instead, the cited host extension encodes information for an HTML page and session ID between a web server and client, not for a file system connection between a local file system and a host file system as claimed. Applicants submit connections between file systems as claimed is different than connections between a web browser and server as discussed in Stedman.

The Examiner cited col. 7, lines 3-20, col. 24, lines 8-44 of Imai and col. 2, lines 55-63 of Stedman as teaching the details concerning the file system connection descriptor. (On page 3, first paragraph of the Final Office Action, the Examiner referenced Stedman. During the phone interview, Applicants and the Examiner discussed that this is a typographical error and that the

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citation in the first paragraph on page 3 to cols. 7 and 24 references Imai and the citation to col. 2 references Stedman) Applicants submit that these cited sections of Imai and Stedman do not teach or suggest encoding information in a metalanguage format on a file system connection descriptor comprised of tags representing a local file system, a host file system, and a mapping as claimed.

The cited col. 7 of Imai mentions that a file requesting client includes a connection unit for setting up a connection with a file server and a file requesting unit to request the file. A file receiving unit receives the file and file storage unit stores the file. Nowhere does this cited col. 7 anywhere teach or suggest encoding information in a metalanguage format on a file system connection descriptor comprised of tags representing a local file system, a host file system, and a mapping as claimed. Instead, the cited col. 7 discusses client units to connect with a server, request a file, receive the requested file, display the file, etc. The specific claimed file system connection descriptor is not taught or suggested.

The cited col. 24 of Imai mentions that a user program requests the transfer and display of file. A request handling unit handles the display request and the file request unit transmits the request. The file server program transfers the requested file to the requesting client. A multiple file transfer program may be used to transfer multiple files to the client. Although the cited col. 24 discusses operations to request and transfer one or more files, nowhere does the cited col. 24 anywhere teach or suggest the claim requirements of a file system connection descriptor having tags in a metalanguage format representing a local file system, a host file system, and a mapping. Instead, the cited col. 24 concerns a file request and transfer operations to transfer a requested file from a server to client.

The cited col. 2, lines 55-63 of Stedman mentions that the client is linked to the server over the Internet and the server is linked to the host over an SNA network. Nowhere in this cited col. 2 of Stedman is there any teaching or disclosure of the claim requirement of a file system connection descriptor having tags in a metalanguage format representing a local file system, a host file system, and a mapping as claimed.

The Examiner, in responding to Applicants arguments on pages 6-7 of the Final Office Action, cited col. 8, lines 49-54 of Imai as teaching the claimed file system connection descriptor. This cited col. 8 discusses a menu transmitted to the client, where the menu is given

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as home pages available at the file server or pages that can be reached by tracing links from the home pages. Applicants submit that this cited menu does not disclose the claim requirements of a file system connection descriptor encoded in a metalanguage format having tags representing a local file system, a host file system, and a mapping between the host and local file system as claimed. Instead, this cited col. 8 discusses a menu of home pages available at a server.

Applicants submit that amended claims 1 and 15 are patentable over the cited combination because the cited Stedman and Imai, alone or in combination, does not teach or suggest all the requirements of claims 1 and 15.

Amended claim 2 recites a data structure embodied in a computer-readable storage medium, said data structure representing information describing a file system connection between a local file system located on a local system and a host file system located on a host system, wherein said data structure comprises a file system connection descriptor, said file system connection descriptor comprising: a local system data structure comprising at least one tag representing the local file system; a host system data structure comprising at least one tag representing the host file system; and a mapping data structure comprising at least one tag representing a mapping between the local file system and the host file system, wherein the tags are encoded in a metalanguage format.

Applicants amended claim 2 in the same manner that claims 1 and 15 were amended, to recite that file system connection descriptor comprises tags in a metalanguage format.

The Examiner cited col. 3, lines 38-49 of Stedman and col. 7, lines 4-23 and col. 8, lines 11-23 of Imai as teaching the requirements of claim 2. (Final Office Action, pg. 4) Applicants traverse.

The cited col. 3 of Stedman discusses multiple communication sessions having one browser application, one host extension object, one display control and one host computer, where a session ID is associated with each. The session ID is inserted in the hypertext link addresses. When the server receives a hypertext link from the client computer, the session ID is extracted and used to identify the host extension corresponding to the originating browser application.

Nowhere does the cited col. 3 anywhere teach or suggest information encoded in a metalanguage format on a file system connection descriptor comprised of tags representing a local file system, a host file system, and a mapping. Instead, the cited col. 3 concerns

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maintaining a session ID to use for multiple communication sessions. The particular claimed file system connection descriptor and tags are not disclosed in this cited col. 3.

The cited col. 7 of Imai mentions that a file requesting client includes a connection unit for setting up a connection with a file server and a file requesting unit to request the file. A file receiving unit receives the file and file storage unit stores the file. Nowhere does this cited col. 7 anywhere teach or suggest encoding information in a metalanguage format on a file system connection descriptor comprised of tags representing a local file system, a host file system, and a mapping as claimed. Instead, the cited col. 7 discusses client units to connect with a server, request a file, receive the requested file, display the file, etc. The specific claimed file system connection descriptor is not taught or suggested.

The cited col. 8 of Imai mentions a request handling unit to handle a file request and that the request processing unit searches a file list for the requested file corresponding to the file request from the file lists and transmits the searched file list to the file requesting client.

Although the cited col. 8 of Imai discusses how a request handling unit searches for a file, nowhere does the cited col. 8 anywhere teach or suggest tags in a metalanguage format representing a local file system, a host file system, and a mapping between the local file system and the host file system as claimed. There is no mention in the cited cols. 7 and 8 of Imai of a mapping between different file systems. Instead, the cited col. 8 discusses how a request for a file is handled.

Applicants submit that claim 2 is patentable over the cited combination of art because the cited Stedman and Imai, alone or in combination, do not teach or suggest all the requirements of claim 2.

Claims 3-8, 9-14, and 16-21 are patentable over the cited art because they depend from claims 2, 1, and 15, respectively, which are patentable over the cited art for the reasons discussed above. The following dependent claims provide additional grounds of patentability over the cited art.

Claims 3, 9, and 16 depend from claims 2, 1, and 15, respectively, and further require that the mapping data structure comprises: a local file extension data structure storing a local file extension; a host file pattern data structure storing a pattern describing a host file to which the local file extension will be applied; and a transfer type data structure storing a transfer type that

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defines how data will be transferred between the host system and the local system for this mapping.

The Examiner cited col. 22, lines 16-53 of Imai as teaching the claim requirement of a host file pattern data structure storing a pattern describing a host file to which the local file extension will be applied. (Final Office Action, pg. 4) Applicants traverse.

The cited col. 22 mentions that a user requests the transfer and the display of a file by issuing a request and uses the URL to identify the file. A request handling unit in the client handles the display, the file request unit transmits the file request, and the file server program transfers the file to the file requesting client. The client may receive a file list. The list includes files having identifiers requested by the user.

The cited col. 22 of Imai discusses handling of a file request between server and client. Nowhere does the cited col. 22 anywhere teach or suggest the claim requirement of a host file pattern data structure storing a pattern describing a host file to which the local file extension will be applied. Instead, the cited col. 22 discusses how a file or list of files matching a request is returned to the client.

The Examiner cited col. 28, lines 38-65 of Imai as teaching the claim requirement of a transfer type data structure storing a transfer type that defines how data will be transferred between the host system and the local system for this mapping. (Final Office Action, pg. 4) Applicants traverse.

The cited col. 28 of Imai discusses a transfer condition for preventing a wasteful transfer of a file of a type which cannot be utilized at the file request client. If a type of the selected file satisfies the transfer condition, the multiple files are transferred. If the type of the selected file does not satisfy the transfer condition, then another file is selected.

Although the cited col. 28 discusses a condition indicating a file type to not transfer, the cited Imai does not teach or suggest the claim requirement of a transfer type data structure storing a transfer type that defines how data will be transferred between the host system and the local system for this mapping. Indicating file types not to transfer as in Imai is different from the claim requirement of a transfer type defining how data will be transferred between a host and local system for a mapping between file systems.

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Accordingly, claims 3, 9, and 16 provide additional grounds of patentability over the cited art.

Conclusion

For all the above reasons, Applicant submits that the pending claims 1-21 are patentable over the art of record. Applicants submit that no additional fee is needed. Nonetheless, should any additional fees be required, please charge Deposit Account No. 09-0460.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

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